

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN
DISASTER SITE LITIGATION

21 MC102 (AKH)

NOTICE TO PRODUCE DOCUMENTS
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 34

To: One Liberty Plaza/General Re, Grubb & Ellis and B.R. Fries
McGIVNEY & KLUGER, P.C.
c/o Richard Leff, Esq.
80 Broad Street
23rd Floor
New York, New York 10004

PLEASE TAKE NOTICE, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Gregory J. Cannata & Associates, attorneys for plaintiffs in the above-captioned matter, requests the above referenced defendant to respond within thirty (30) days to the following demands for document production with reference to One Liberty Plaza, as referenced in the deposition of Michael Rea, on July 30th, 2012, at or about page as referenced below. To the extent records were already exchanged, please provide the bates numbers of the requested record(s) on Merrill Lextranet.


1. Any work records in the possession of General Re Services Corporation regarding work performed onsite, as requested on or about page 80 in the above referenced deposition post 9-11-01 in response to the events of 9/11/01 as well as any safety manuals or documentations relative to a response to an emergency situation.

2. Any contact information for Mr. Haskel Jacobson and Mrs. Sheryl Broas, as requested on or about page 80 in the above referenced deposition.

Plaintiffs reserve their rights to supplement this Notice and/or service additional Notices throughout the course of this litigation

Dated: New York, New York
February 27, 2013

GREGORY J. CANNATA & ASSOCIATES
Plaintiffs- Liaison Counsel

By: 
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